

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JEFFREY LICHTENSTEIN, et al.,

Plaintiffs,

v.

TRE HARGETT, et al.,

Defendants.

Civil No. 3:20-cv-00736

MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that, upon the annexed Declarations of Danielle Lang; Gloria Sweet-Love, on behalf of the Tennessee State Conference of the NAACP; Jeffrey Lichtenstein, on behalf of the Memphis Central Labor Council and in his individual capacity; Kermit Moore, on behalf of the Memphis A. Philip Randolph Institute; Charlane Oliver, on behalf of The Equity Alliance; and Dawn Harrington, on behalf of Free Hearts, the exhibits attached thereto, the accompanying Memorandum of Law, and all other pleadings and proceedings in this action, Plaintiffs Memphis A. Phillip Randolph Institute (“APRI”), The Equity Alliance (“Equity Alliance”), Free Hearts, The Memphis and West Tennessee AFL-CIO Central Labor Council a/k/a the Memphis Central Labor Council (“MCLC”), and The Tennessee State Conference of the NAACP (“Tennessee NAACP”) (together, the “Organizational Plaintiffs”), together with Plaintiff Jeffrey Lichtenstein (“Plaintiff”), by and through their undersigned counsel, will, as soon as counsel may be heard, move this Court for an Order preliminarily enjoining Defendants Tre Hargett, Mark Goins, and Amy Weirich, and granting the relief set forth in Plaintiffs’

accompanying proposed order and such other and further relief that the Court deems just and proper.

As set forth in detail in the Memorandum of Law, Plaintiffs are likely to succeed on the merits of each of their moved-on claims and will suffer irreparable harm absent relief. The balance of the equities moreover favors Plaintiffs. For these reasons, Plaintiffs are entitled to a preliminary injunction and request that the Court enter the proposed order submitted herewith.

Prior to the filing of this Motion, in accordance with Local Rule 7.01(a)(1), Plaintiffs' counsel advised Defendants' counsel of their intention to move for a preliminary injunction. Defendants' counsel indicated that they would oppose the Motion and requested relief.

Dated: August 31, 2020

Respectfully Submitted,

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Certificate of Service

I, Bill Harbison, certify, pursuant to Local Rule 5.01, as follows:

That on this 31st day of August, 2020, the foregoing Motion for Expedited Briefing was served via electronic and first-class mail on the following:

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Counsel for Defendants

That the foregoing Motion for Expedited Briefing will be served with the Summons and Complaint, in accordance with Rule 4(j)(2) of the Federal Rules of Civil Procedure and Rule 4.04 of the Tennessee Rules of Civil Procedure, via Certified United States Mail on the following:

Amy Weirich, in her official capacity as
District Attorney General for Shelby County, Tennessee
201 Poplar Avenue, #301
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/s William L. Harbison